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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

Fabiola Pagan,

Debtor.

Chapter 13

Case No. 17-22056-JKS

Hearing Date: March 8, 2018 at 11:00 a.m.

**CERTIFICATION OF COUNSEL IN SUPPORT OF DEBTOR'S
OPPOSITION TO CREDITOR'S APPLICATION FOR EARLY
TERMINATION OF LOSS MITIGATION**

I, Christopher Balala, hereby certify as follows:

1. I represent Fabiola Pagan (the "Debtor") in the above captioned Chapter 13 case, and as such, I have personal knowledge of the facts recited herein.
2. I submit this certification in opposition to M&T Bank, servicer for Lakeview Loan Servicing, LLC's ("M&T") Application for Early Termination of Loss Mitigation.
3. On June 12, 2017 the Debtor filed a voluntary petition for relief pursuant to Chapter 13, Title 11 of the United States Bankruptcy Code.
4. On August 7, 2017 this Court entered the Loss Mitigation Order allowing loan modification negotiations to commence.

5. On November 16, 2017 an Order Extending Loss Mitigation until February 7, 2018 was granted.

6. On February 6, 2017, I caused to be filed another Application for Extension of Loss Mitigation. The objection deadline was February 9, 2018. To date, no opposition has been filed and the Order should have been entered.

7. On February 7, 2018, M&T filed the instant Application for Early Termination of Loss Mitigation because the Initial Package has not yet been returned by the Debtor.

8. The Debtor is elderly and had difficulty in providing her Social Security and Pension income verification, necessary to complete the required package to M&T.

9. The remaining documents will be submitted by the Debtor prior to the hearing date, currently scheduled for March 8, 2018.

Therefore, the Debtor requests the Court deny M&T's Application for Early Termination of Loss Mitigation and enter the Debtor's Order Extending Loss Mitigation as the objection deadline for that Application has passed.

/s/ Christopher J. Balala
Christopher J. Balala, Esq.

Dated: February 13, 2018